

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**KYKO GLOBAL, INC., a Canadian
corporation, KYKO GLOBAL GmbH, a
Bahamian corporation, PRITHVI
SOLUTIONS, INC., a Delaware Corporation,**

Plaintiffs,

v.

**PRITHVI INFORMATION SOLUTIONS,
LTD, an Indian corporation, VALUE TEAM
CORPORATION, a British Virgin Islands
corporation, SSG CAPITAL PARTNERS I,
L.P., a Cayman Islands Limited Partnership,
SSG CAPITAL MANAGEMENT (HONG
KONG) LIMITED, a private Hong Kong
company, MADHAVI VUPPALAPATI, an
individual, ANANDHAN JAYARAMAN, an
Individual, SHYAM MAHESHWARI, an
individual, IRA SYAVITRI NOOR A/K/A
IRA NOOR VOURLOUMIS, an individual,
DINESH GOEL, an individual, WONG
CHING HIM a/k/a Edwin Wong, an
individual, ANDREAS VOURLOUMIS, an
individual, PRITHVI ASIA SOLUTIONS
LIMITED, a Hong Kong company,**

Defendants.

Civil Action No. 2:18-cv-01290-WSS

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DEFENDANTS' MOTION FOR PROTECTIVE ORDER

1. The Court ordered that the parties meet and confer regarding a protective order to govern this case. ECF No. 174 (“By August 25, 2020, the parties shall meet and confer regarding a stipulated protective order and submit a joint order for the Court’s signature. To the extent that the parties cannot agree on any terms of the proposed order, they shall each submit their position, in redline, for the Court’s review.”).

2. The SSG Defendants¹ proposed that the parties agree to the Court's standard protective order. The SSG Defendants circulated that standard protective order to all counsel for review. Plaintiffs' counsel circulated a counter-proposal, containing proposed revisions to Paragraphs 6, 7, 8, 9, 14, 23 of the standard order and to Appendix A and Appendix B.

3. Counsel for the SSG Defendants believe the Court's comments during the Case Management Conference on August 11, 2020, required the parties to file a joint proposed protective order, identifying their disagreements in a single document. They attempted to coordinate with Plaintiffs' counsel to file a joint motion and a joint redlined Protective Order, explaining that the Court's scheduling order required a joint filing. The SSG Defendants were finalizing comments to the draft Protective Order, along with a joint proposed motion, and asked counsel for Plaintiffs to wait for those comments before filing anything. *See* Ex. A. Plaintiffs instead filed their edited version of the Protective Order without the SSG Defendants' comments. *Id.*

4. The SSG Defendants believe it is important to explain their positions regarding Plaintiffs' edits to the standard Protective Order. Accordingly, they have provided marginal comments where appropriate, explaining why Plaintiffs' proposed revisions should not be adopted. Ex. B. A clean version of the standard Protective Order is also attached to this motion. Ex. C.

5. Counsel for Defendant Jayaraman agrees with the SSG Defendants' proposed Protective Order.

WHEREFORE, the SSG Defendants, joined by Defendant Jayaraman, respectfully

¹ The "SSG Defendants" include only SSG Capital Partners I, L.P., SSG Capital Management (Hong Kong) Ltd., Edwin Wong, Andreas Vourloumis, Shyam Maheshwari, Dinesh Goel, and Ira Syavitri Noor.

request that this Court enter the proposed Protective Order at Exhibit C. The SSG Defendants are available for a status conference to discuss their positions, if it would be helpful for the Court.

Dated: August 25, 2020

Respectfully submitted,

/s/ Jeffrey T. Morris

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and Value Team Corporation**